



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 20 2015

OFFICE OF
SOLID WASTE AND
EMERGENCY RESPONSE

Lois Marie Gibbs, Ph.D.
Executive Director
Center for Health, Environment and Justice
P.O. Box 6806
Falls Church, Virginia 22040-6806

Dear Dr. Gibbs:

Thank you for your letter of December 10, 2014, regarding the West Lake Landfill Superfund Site in Bridgeton, Missouri, and the U.S. Environmental Protection Agency's (EPA's) ongoing efforts to address the site's potential risks. We take seriously the concerns you and others have shared. The EPA considers community input at Superfund sites an integral part of the remedial process.

The West Lake Landfill Site presents complex scientific and engineering challenges. The EPA's team of scientists and engineers in Region 7, our Office of Research and Development and the Office of Solid Waste and Emergency Response work together to gather and evaluate the right data to support the decisions necessary to safeguard the health of this site's neighbor and those who work at and around the site. Region 7 is leading the work at the West Lake Site and is coordinating closely with us at headquarters. We are working together to take actions based on sound science and the law.

I appreciate the concern about the subsurface smoldering event (SSE) in the adjacent Bridgeton Landfill. Our EPA team continues to work in partnership with the Missouri Department of Natural Resources to analyze what the data might indicate about the potential movement of the SSE. We will assess the SSE's potential influence on the hazardous substances in the West Lake Landfill and potential impact on the implementation of EPA's selected remedy.

I am concerned that some of the statements in the attachment to your letter might imply a misunderstanding of the documents you identify and how they relate to the CERCLA process. I am enclosing an update to offer clarification on the status of some of the CERCLA and related activities at the site.

Through our ongoing work toward a final remedy at the West Lake Site, as well as the analysis of a proposed isolation barrier, we are committed to keeping the public protected from the radiological contaminants contained within the West Lake Landfill.

Again, thank you for writing.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mathy Stanislaus".

Mathy Stanislaus
Assistant Administrator

Enclosure

Status of Work

Region 7 is in the process of having the Potentially Responsible Parties perform additional investigation and supplemental feasibility study work that EPA will use to evaluate the previously selected remedy and other remedial alternatives. As a part of this process, EPA's future decision on the final remedy will be provided to the public for their review and comment. Many of the issues pointed out in your December 10, 2014, letter, such as evaluation of the potential impact of the Subsurface Smoldering Event (SSE) on the final remedial action and evaluation of risks associated with those potential impacts, will be considered during this process.

EPA is continuing to assess whether the SSE in the Bridgeton Landfill substantiates the need for response actions to address a threat of release of hazardous substances from the West Lake Landfill. The following activities support this assessment:

- a. The PRPs have provided an alternatives analysis for construction of a barrier between the existing SSE and the RIM.
- b. The PRPs have agreed to more fully characterize the extent of RIM adjacent to the existing transfer station and along the former North Quarry ledge/boundary.
- c. The PRPs have also agreed to make available representative samples of RIM to EPA in order for us to test the RIM under normal and simulated SSE conditions.
- d. The US Army Corps of Engineers continues to provide support to EPA for all activities related to the SSE.

EPA scientists will use the data and information collected as a part of these efforts to evaluate potential exposures and risks posed to on-site workers and the surrounding communities if the SSE should come into contact with the RIM. Based on our evaluation of all of the above, EPA will take the necessary actions to address releases of hazardous substances from the West Lake Landfill site as necessary.

